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20
21 **UNITED STATES DISTRICT COURT**
22 **NORTHERN DISTRICT OF CALIFORNIA**

23 NEETA THAKUR, et al.,

24 Plaintiffs,

25 vs.

26 DONALD J. TRUMP, et al.,

27 Defendants.

Case No. 3:25-cv-04737-RL

**DECLARATION OF DYLAN M. SILVA
IN SUPPORT OF PLAINTIFFS'
RESPONSE TO ORDER TO SHOW
CAUSE**

Judge: The Honorable Rita F. Lin

1 I, Dylan M. Silva, declare as follows:

2 I am a member in good standing of the State Bar of California and the bar of this Court. I
3 am an associate of Farella Braun + Martel LLP and represent all Plaintiffs in this action. I
4 respectfully submit this declaration in support of Plaintiff's Response to Order to Show Cause. I
5 have personal knowledge of the facts set forth in this declaration, and could testify competently to
6 them if called upon to do so.

7 1. Attached as **Exhibit 1** is a true and correct copy of an August 8, 2025 article by
8 Jonathan Cohn titled *He's the "Mozart" of Math and Trump Killed His Funding*, available at
9 thebulwark.com/p/terence-tao-ucla-mathematician-mozart-of-math-trumpfunding-nsf.

10 2. Attached as **Exhibit 2** is a true and correct copy of an August 9, 2025 New York
11 Times article titled *Trump Wants U.C.L.A. to Pay \$1 Billion to Restore Its Research Funding*,
12 available at <https://www.nytimes.com/2025/08/08/us/trump-ucla-research-funding-deal.html>.

13 I declare under penalty of perjury under the laws of the State of California and the United
14 States that the foregoing is true and correct.

15 Executed this 11th day of August, 2025, in San Francisco.

16
17
18 By: /s/ Dylan M. Silva
Dylan M. Silva

Exhibit 1

He's the 'Mozart' of Math and Trump Killed His Funding

 thebulwark.com/p/terence-tao-ucla-mathematician-mozart-of-math-trump-funding-nsf

Jonathan Cohn

August 6, 2025

TERENCE TAO MAY BE ONE OF THE SMARTEST human beings on the planet. That's not an exaggeration.

Now a UCLA professor, Tao has been a mathematics [superstar](#) for pretty much his entire life, going all the way back to the early 1970s when he was a [2-year-old](#) with building blocks showing the other kids how to count. He was 7 when he started calculus, 13 when he became the youngest person ever to win the International Mathematical Olympiad, and 19 when he started his Ph.D. at [Princeton](#).

Tao's work on prime numbers has provided crucial insights into random-number generation, which is the way computers produce the (nearly) unpredictable figures that are necessary for cryptography and cybersecurity. His research into the math of imaging has helped to make MRIs faster and smarter.

In 2006 Tao was awarded the [Fields Medal](#)—math's equivalent of the Nobel Prize, as anyone who has watched [Good Will Hunting](#) knows. In 2017, *National Geographic* [included Tao in its "Genius" issue](#) alongside Michelangelo, Darwin, and Einstein. And among his many admirers Tao is known as the "[Mozart of Math](#)"—a term of affection in a sometimes cutthroat world, where Tao has a reputation for mentoring young, still undiscovered scholars and sharing credit generously.

He is pretty much the platonic model of an intellectual, innovator, and teacher—the best of America, in so many ways. And now he's a cautionary tale too, because he just lost his funding in the latest wave of Trump administration cuts. It has left him questioning the future of American STEM research, and his place within it.

"A year ago I was absolutely sure I would be staying at UCLA for the foreseeable future," Tao told me. "But now that there are existential risks . . . I cannot make any long-term predictions."

The wave hit on Sunday, when

federal agencies including the National Science Foundation [notified](#) UCLA that they were summarily—and indefinitely—suspending federal research grants. That translates to hundreds of millions of dollars in lost support, according to a tally being kept by the volunteer organization [Grant Witness](#).

Among the suspended grants is one that effectively funds graduate-student researchers in Tao's lab. Another is for UCLA's [Institute for Pure and Applied Mathematics](#), with which Tao has worked closely and where he is set to become director of special projects.

The institute is one of six around the country that NSF funds for the specific purpose of convening discussions among researchers from different disciplines. It recently received "preliminary approval" for five more years of NSF backing, Tao explained in a [social media post](#). But with the suspension in place, Tao said, the institute "now only has enough emergency funding for a few months of further operation at best."

The ostensible, official reason for the UCLA suspensions, Chancellor [Julio Frenk](#) told the university community in an [open letter](#), is the same one the Trump administration has cited when cutting off funds to Columbia, Harvard, and other high-profile universities. The schools, according to the administration, have violated civil rights law by failing to combat antisemitism on their campuses.¹

UCLA was the site of a major pro-Palestinian encampment—one that [police eventually broke up](#) and that remains the subject of controversy, on and off campus. But another, [more likely](#), explanation is that UCLA was guilty of simply being a major university at a time when the Trump administration has been systematically slashing funds to such institutions—out of a desire to punish leftist academics, or to silence a source of independent thought, or maybe just to reduce federal spending.

After all, these targeted rescissions for schools like UCLA aren't happening in isolation but alongside broader cuts at NSF, the National Institutes of Health, and other funding agencies. These cuts have brought federal support for scientific research to its lowest level in decades, according to a *New York Times* [analysis](#).

Tao is in a privileged position, as a rock star in his field and a recipient of its highest honors: He can raise money from private sources in a way few other scholars can. But he worries about the effects Trump's cuts will have on the broader research community—and says he knows, firsthand, just how critical government support can be.

AS AN EXAMPLE, TAO POINTED TO his research on "[compressed sensing](#)"—which, crudely speaking, is about how to produce sharper, more detailed images with less data than older technologies required. That research has transformed MRIs, in part by reducing the amount of time patients have to spend inside those giant, noisy machines.

"A scan which used to take, say, three minutes takes just thirty seconds now and this is particularly important when imaging young kids, who are often very restless," Tao noted. "In the past, we had to actually sedate the kids to get them to stay long enough for the MRI scan to complete."

Compressing the time for an MRI isn't just about helping kids make it through what can be a frightening experience even for adults. It's also about enabling hospitals to run more efficiently, not to mention allowing physicians to diagnose conditions more accurately. And there have been spillover effects to other fields: Astronomers and seismologists came to realize Tao's math could help them understand and improve methods they were already using in their work.

None of this might have happened without support for theoretical research and collaboration across disciplines, the kind that agencies like NSF have traditionally funded—and that the private sector won't sustain on its own, because the work is too risky and open-ended.

"The actual machines that introduced this technology were developed by Siemens and Philips and LG, and all the major industry leaders," Tao told me. "But they didn't invest in the basic research to do this, because they didn't know that it was even feasible. It [the companies' investment] was only after there was this public academic literature saying that, yeah, this is theoretically possible."

"The private sector is very good at the 'last mile' of innovation," Tao added. "But if the private sector wants to spend money on developing technology, they want some assurances that there's going to be a high chance of it working to begin with."

TAO WAS JUST AS EMPHATIC about the importance of government supporting researchers, especially those who—unlike him—have yet to make a mark on their fields.

"Research is not really led by superstars as much as you think," Tao said.

You go on a safari, and maybe you see the lions, the tigers, and the really big game, and you think that these are the most important animals in the ecosystem. But there are a lot of smaller animals and plants and insects that are completely essential, and they all interact with each other. . . . You have to support the entire ecosystem. The leaders themselves, if they don't have the people around them to interact with, they're going to be a lot less effective.

And that's to say nothing of what young researchers might produce on their own in the future, Tao pointed out—something he said he knows from his own experience. "I was just a fresh graduate student—I was nobody—but I was invited to participate in this program in my field, which had a couple dozen people, experts, senior people, and junior people, giving talks, talking to each other," Tao said. "This institute, which was NSF-funded, provided the location and gave some housing support. We had teas where we would socialize. I learned a lot of math and made a lot of long-term connections, and basically it launched my career. I wouldn't have the Fields Medal work, basically, if I didn't have these initial contacts and networking."

And the next generation of researchers might not get those kinds of opportunities, Tao worries, thanks to Trump administration cuts.

“The damage on graduate students is more direct,” he said, “because these students—they haven’t done blockbuster work yet by and large. It’s their future selves who are going to do all that great work. But you won’t see that if they’re so discouraged that they drop out now.”

TAO WAS CAREFUL IN OUR INTERVIEW to say that he wasn’t offering an opinion on the substance of the Trump administration’s antisemitism charge—or on its motives, for that matter, though he noted a certain irony of cutting off funds while claiming to strengthen the university’s research environment.

But Tao had plenty to say about the way the administration carried out the suspension—with a sudden shutdown that, he said, seemed designed to be “maximally disruptive and punitive.” And that process itself could have a chilling effect on research, Tao warned.

“Until very recently, there was a certain predictability” to the American system, Tao said, and “we very much implicitly relied on it to make long-term plans. We hire postdocs and graduate students for three or four years, assuming that the funding that we’ve secured is actually secure. There’s a lot of basic assumptions that just make the country work, and it wasn’t really anticipated that a single administration could basically destroy all this sense of predictability.”

And of course all of this is happening while the Trump administration is simultaneously making it more difficult for foreigners to visit² and study here—something Tao knows especially well, because he was born and spent his early childhood in Australia, before his parents moved to the United States.

“Moving to research in the U.S., this is a decades-long commitment—you are uprooting your family and everything, you want some assurances that there’s not really chaos,” Tao said. “One thing the U.S. offered for seventy years was stability in a way that many countries could not guarantee. That was a major draw. And so unfortunately, regardless of anything else that happens, we’ve already destroyed the impression of stability that the U.S. enjoyed.”

Tao said he’s already getting feelers from institutions in other countries, as are other senior scholars. And while he said he has no idea how many scholars actually will end up leaving, he worries the United States is on its way to losing—and may have already lost—one of its greatest sources of international strength.

We've sort of benefited from a reverse brain drain from many other countries, until very recently. The academic environment here was excellent. The financial resources were pretty good—never as much as we would ideally like, but still enough to support a very healthy ecosystem, more so than many other countries. And just the sheer scale and the academic freedom and the diversity. And there was this network effect, this tipping point of really diverse, really good institutions—with lots of really good people, lots of really good activities. For like seventy years, this has been the place to be.

Tao noted that during that seventy-year period, the United States had benefited because autocrats abroad—in Germany and the old Soviet Union—were purging scholars and dismantling institutions to impose their own kinds of conformity.

He's right. And it doesn't take overwrought Hitler or Stalin comparisons to see in this a simpler lesson: Nations can squander their academic and innovative power easily, and once gone it's awfully hard to get back.

1

I submitted detailed questions to both NSF and NIH about their cuts. An NSF spokesperson responded with this statement: "The U.S. National Science Foundation has informed the University of California, Los Angeles that the agency is suspending awards to UCLA because they are not in alignment with current NSF priorities and/or programmatic goals." NIH responded through an HHS official, who said "We will not fund institutions that promote antisemitism. We will use every tool we have to ensure institutions follow the law."

2

Tao also said virtual meetings aren't a substitute: "We can participate in international conferences by zoom, or domestic conferences by zoom, but it is not ideal. A lot of the value of these meetings comes from face-to-face interactions. Often in a zoom talk, the speaker speaks and there are very few questions, especially from junior people."

Exhibit 2

Trump Wants U.C.L.A. to Pay \$1 Billion to Restore Its Research Funding

 [nytimes.com/2025/08/08/us/trump-ucla-research-funding-deal.html](https://www.nytimes.com/2025/08/08/us/trump-ucla-research-funding-deal.html)

Alan Blinder, Michael C. Bender

August 8, 2025



The University of California, Los Angeles, campus. Credit...Alisha Jucevic for The New York Times

The Trump administration is seeking more than \$1 billion from the University of California, Los Angeles, to restore hundreds of millions of dollars in federal research funding that the government halted, according to a draft of a settlement agreement reviewed by The New York Times.

The proposal calls for the university to make a \$1 billion payment to the U.S. government and to contribute \$172 million to a claims fund that would compensate victims of civil rights violations.

If U.C.L.A. accedes to the demand, it would be the largest payout — by far — of any university that has so far reached a deal with the White House. Columbia University agreed to pay \$221 million in connection with its settlement with the government, and Brown University pledged to spend \$50 million with state work force programs.

The University of California's president, James B. Milliken, said in a statement on Friday that the university had "just received a document from the Department of Justice and is reviewing it."

He added, "As a public university, we are stewards of taxpayer resources, and a payment of this scale would completely devastate our country's greatest public university system as well as inflict great harm on our students and all Californians."

Administrators at the campus in Los Angeles did not immediately respond to a request for comment. Julio Frenk, U.C.L.A.'s chancellor, said this week that about \$584 million in research funding was already "suspended and at risk." The university, like many other top schools, is deeply dependent on federal research money; about 11 percent of its revenues come from federal grants and contracts.

The Trump administration has largely targeted elite private universities in recent months as a part of what it has depicted as a campaign to fight antisemitism and reshape institutions that it views as cathedrals of liberalism.

But its turn toward U.C.L.A. has been sharp. On July 29, the day the University of California settled a lawsuit that accused U.C.L.A. of allowing pro-Palestinian protesters to block Jewish students on campus, the Justice Department said it believed U.C.L.A. had committed civil rights violations.

Dr. Frenk announced later that week the federal government had started freezing research money.

The White House's demands of U.C.L.A. fit into a broad pattern of how the Trump administration has targeted California. The state's governor, Gavin Newsom, is one of President Trump's top political foes and a potential candidate for the White House.

On Thursday, the day before the terms of the White House's proposed settlement emerged, Mr. Newsom suggested the University of California would not bow to the federal government.

"I will fight like hell to make sure that doesn't happen," said Mr. Newsom, an ex officio member of the university's board of regents. "There's principles. There's right and wrong, and we'll do the right thing, and what President Trump is doing is wrong, and everybody knows it."

He added that he would "do everything in my power to encourage them to do the right thing and not to become another law firm that bends on their knees, another company that sells their soul, or another institution that takes a shortcut and takes the easy wrong versus the hard right."

But the University of California has shown a willingness to talk to the federal government. Mr. Milliken, the system's newly installed president, said on Wednesday that the university had agreed "to engage in dialogue with the federal administration." Mr. Milliken, though, sharply criticized the administration's moves against funding.

"These cuts do nothing to address antisemitism," said Mr. Milliken, who started his job on Aug. 1. "Moreover, the extensive work that U.C.L.A. and the entire University of California have taken to combat antisemitism has apparently been ignored.

The White House's proposed terms, some of which were first reported by CNN, were not exclusively financial. Among other conditions, the government is seeking the appointment of a monitor to enforce the settlement's terms, the abolition of scholarships connected to race or ethnicity and the cessation of diversity statements in hiring.

But the government included a provision, as it did with Brown and Columbia, that would seem to keep U.S. officials from using the settlement to interfere directly with academic freedom, admissions and hiring. On Friday, Governor Newsom, along with several other state officials, called the White House's proposal "a billion-dollar political shakedown."

"Trump has weaponized the Department of Justice to punish California, crush free thinking, and kneecap the greatest public university system in the world," the officials said in a statement, adding, "We are united against Trump's assault and will fight like hell because California will not bow to this kind of disgusting political extortion."

The administration is negotiating with a handful of universities, including Cornell and Harvard. And although Brown and Columbia each agreed to payments, the government's settlement with the University of Pennsylvania included no financial penalties.

Among the universities that have been targeted by the Trump administration, Harvard is the only one that has sued, arguing the government's moves are illegal. It was unclear whether U.C.L.A. would take that step.

Even as Harvard's case moves through the court system, the school has been in talks with the Trump administration in an effort to end the conflict.